

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JANELLE HILL, and)
WILLIAM HILL,)
Individually and as the Next Friends of)
SAVANNAH A. HILL,)
)
Plaintiffs)
v.)
)
SANOFI-AVENTIS U.S., INC.)
)
Defendant)
_____)

Civil No. 1:09cv463

PLAINTIFFS' AMENDED DESIGNATION OF EXPERT WITNESSES

COME NOW, the Plaintiffs, Janelle Hill and William Hill, individually and as Next Friends of Savannah A. Hill, by counsel, and designate the individuals set forth below to be called as expert witnesses on their behalf in the trial of this case.

The Plaintiffs' designations of expert witnesses and testimony at this time are as follows:

1. Susan Riddick-Grisham- Life Care Planner. 3126 West Cary Street, Richmond Virginia, 23221. Phone: 804-310-5239

The subject matter of Ms. Riddick-Grisham's testimony will be the nature and costs of care that will be required for Savannah A. Hill, the minor child whose injuries are the subject of this action, throughout her life. Ms. Susan Riddick-Grisham will testify as to the measures that will need to be taken and expenditures that will be required for evaluation, therapy, diagnostic testing, educational assessment, wheelchair and other aids

to independent functioning, orthotics, prosthetics, home furnishings and care, medical care, transportation, therapeutic recreation and architectural renovations.

Ms. Susan Riddick-Grisham's testimony will be consistent with her Report, a copy of which is attached hereto and incorporated by reference.

Ms. Susan Riddick-Grisham's opinions and testimony will be based on her training and experience and her review of extensive records, as described in her attached Report.

2. Dr. Robert Sklaroff- Hematologist. 50 East Township Line Road, Suite 130, Elkins Park, Pennsylvania, 19027-2253. Phone: 215-333-4900

The subject matter of Dr. Sklaroff's testimony will be the complications of Plaintiff Janelle Hill's pregnancy and delivery, as a result of the use of Lovenox during her pregnancy, the resulting injuries to Savannah A. Hill, the minor child whose injuries are the subject of this action, the inadequacy of warnings provided by the Defendant for the use of the drug Lovenox, especially as applied to this particular case, the inappropriate marketing of Lovenox by the Defendant for use by women during pregnancy, the misleading of doctors by the Defendant as to what monitoring of women using Lovenox during pregnancy is or is not needed, and other inappropriate aspects of the design, testing manufacture and marketing of Lovenox by the Defendant.

Dr. Sklaroff's testimony will be consistent with his Reports, copies of which are attached and incorporated herein by reference.

. Dr. Sklaroff's opinions and testimony will be based on his training and experience and his review of extensive records, as described in his attached Reports.

3. Dr. Eldon Nyhart- Pharmacologist and Toxicologist. P.O. Box 5045, Zionsville, Indiana, 46077. Phone: 317-506-7000

The subject matter of Dr. Nyhart's testimony will be the pharmacological processes by which Lovenox produces injurious results from its use during pregnancy, as was the case in the present action. Dr. Nyhart's testimony will be consistent with his Report, a copy of which is attached hereto and incorporated by reference.

Dr. Nyhart's opinions and testimony will be based on his training and experience and his review of records pertaining to this case, as described in his attached Report.

4. Dr. Jerry Bush- Internal Medicine and Pharmacology/Toxicology. McIntosh Trial Family Practice, 747 South Hill Street, Griffin, Georgia 30224 Phone: 770-228-5407

The subject matter of Dr. Jerry Bush's testimony will be the complications of Plaintiff Janelle Hill's pregnancy and delivery, the injuries sustained by Savannah Hill, and the reasonableness, necessity and causation of medical and related care expenditures incurred and projected to be incurred in the future for Savannah Hill as a result of the use of Lovenox by Janelle Hill during her pregnancy.

Dr. Bush's testimony will be consistent with his Report, a copy of which is attached and incorporated herein by reference.

Dr. Bush's opinions and testimony will be based on his training and experience and his review of records pertaining to this case, as described in his attached Report.

5. Dr. James Lemons- Perinatology/ Neonatology. Riley Children's Hospital, RR 208, 699 West Drive, Indianapolis, Indiana 46202-5119 Phone: 317-274-4716

The subject matter of Dr. James Lemons' testimony will be the complications of Plaintiff Janelle Hill's pregnancy and delivery, as a result of the use of Lovenox during

her pregnancy and the resulting injuries to Savannah A. Hill, the minor child whose injuries are the subject of this action.

Dr. Lemons' testimony will be consistent with his Report, a copy of which is attached and incorporated herein by reference.

Dr. Lemons' opinions and testimony will be based on his training and experience and his review of records pertaining to this case, as described in his attached Report.

Respectfully submitted,
Janelle B. Hill
William David Hill
Individually and as the Next
Friends
of Savannah Hill
By Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of September, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and sent a copy by electronic mail to:

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